UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

BELCALIS MARLENIS ALMANZAR, *

*

Plaintiff, *

* Civil Action No.

v. * 1:19-cv-01301-WMR

*

LATASHA TRANSRINA KEBE et al., *

*

Defendants. *

DEFENDANT KEBE'S MOTION TO FILE DOCUMENTS UNDER SEAL

COMES NOW Latasha Kebe (hereinafter referred to as "Ms. Kebe"), by and through undersigned Counsel, and, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties' Consent Protective Order (Dkt. 53), and Section II.J to Appendix H of this Court's Local Rules, respectfully requests that this Honorable Court enter an Order permitting Ms. Kebe to file the following documents for under seal:

- 1. Defendant Kebe's Brief Opposing Plaintiff's Motion to Compel (hereinafter referred to as "Kebe's Opposition Brief");
- 2. Declaration of Sadeer Sabbak (hereinafter referred to as "Sabbak Declaration");
- 3. Exhibit 1: excerpts from the 11/19/20 Deposition of Latasha Kebe;
- 4. Exhibit 2: excerpts from the 11/30/20 Deposition of Latasha Kebe; and

5. Exhibit 3: excerpts from the 11/29/20 Deposition of Cheick Kebe.

This Motion is supported by Defendant Kebe's Memorandum of Law, submitted contemporaneously herewith, and a Proposed Order, attached hereto.

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 26th day of January, 2021.

/s/Olga Izmaylova olga@silawatl.com Georgia State Bar No. 666858

/s/Sadeer Sabbak ssabbak@silawatl.com Georgia State Bar No. 918493

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CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2021, I electronically filed Defendant Kebe's Motion to File Documents Under Seal, Brief in Support of Motion, and a Proposed Order with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Sadeer Sabbak ssabbak@silawatl.com Georgia State Bar No. 918493

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